

EXHIBIT 16

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

MAR - 6 2019

B VOTRUBA

James Hart Stern
12625 Frederick Street Suite i-5
Moreno Valley, California 92553
323 842-0945
jamesstern@thejamesstern.com

SUPERIOR COOURT OF CALIFORNIA OF
RIVERSIDE

JAMES HART STERN

Plaintiff,

Vs,

JEFF SCHOEP

BURT COLUCCI

ACACIA DIETZ

MIKE SCHLOAR

JOHN DOES 1-20

Defendant

Case No.

RIC 19 0 17 63

Cause of Actions:

1. THEFT
2. FRAUD
3. DEFAMATION OF CHARACTER
3. SLANDER
4. PERSONAL INJURY

James Hart Stern Plaintiff can be served at 12625 Frederick Street suit i-5 Moreno Valley, Ca. 92553.

JEFF SCHOEP, BURT COLUCCI, ACACIA DIETZ, MIKE SCHLOAR, Defendant can be served at 11246 DODGE AVE WARREN, MI 48089 USA

STATEMENT OF FACTS

Defendants. Jeff Schoep former president of the Nationalist movement (NSM) after being named in a law suite in the state of Virginia became worried about losing his personal assets and being prosecuted under the RICO ACT. Contacted James Hart Stern President of Racial Reconciliation Outreach Ministries to discuss his situation, confessed to James Hart Stern he thought the NSM websites nsm88.org was an Abacross around his neck and he was over the NSM strictly for the money and he did not like the people in the organization. He decided to legally dissolve the Corporation and start another group with a different name. Hearing this it scared James Hart Stern because he new by Jeff Schoep doing this any one else could simply refile the Corporation and carry on the same illegal and immoral action that Jeff Schoep

CAUSE OF ACTIONS: 1. THEFT 2. FRAUD 3. DEFAMATION OF CHARACTER 3. SLANDER 4. PERSONAL INJURY - 1

1 carried out for the pass 25 years. Jeff Schoep showed a desire to have his name dropped of the law suit
2 filed in Virginia at any cause, even if he had to testify against the other defendant's name on there.
3 James Hart Stern suggested Schoep turn the NSM and the website nsm88.org over to him and this will
4 assure the world it would not be used in the same manner he (Schoep) used it. Schoep filed with the
5 secretary of state the changes naming James Hart Stern as the new President, Secretary, and Treasure
6 of the NSM and to prove his intentions where real he signed two notarized affidavits to this effect. As of
7 February 15, 2019 James, Hart Stern became the new President of the NSM, and Jeff Schoep was
8 completely out of the Corporation. This move got world wide attention. The Magistrate Judge on
9 February 22, 2019 in a court hearing order James Hart Stern to sign all legal documents in behalf of the
10 NSM and that will be binding. On March 6, 2019 with out any legal grounds or authority Jeff Schoep
11 criminally, filed documents naming BURT COLUCCI,
12 ACACIA DIETZ, MIKE SCHLOAR as officers to the corporation. Jeff Scheop committed Theft stilling this
13 from James Stern and Fraud by having no right to do this, and Perjury, he signed Government documents
14 fraudulently. BURT COLUCCI, ACACIA DIETZ, MIKE SCHLOAR conspired to commit Theft, Fraud and
15 other acts to deprive James Hart Stern of His rights to his Property and to carry out his duties.
16 Defendants contact the website companies that host the site and interfere with the day to day operation of
17 James Hart Stern maintaining these websites and they keep changing the access codes to lock James
18 Hart Stern.
19 Plaintiff will name Does 1-20 at a later date as their names become available.

20
21 **FIRST CAUSE OF ACTION**

22 **THEFT**

23 . Defendants took James Hart Stern property without his permission or consent with the intent to deprive
24 him the rightful owner of it.

25 **SECOND CAUSE OF ACTION**

26 **FRAUD**

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28 CAUSE OF ACTIONS:1. THEFT2. FRAUD3. DEFAMATION OF CHARACTER3. SLANDER4. PERSONAL
INJURY - 2

1 Defendants committed fraud with deliberate deception to secure unfair and unlawful gain of the NSM, and
2 to deprive James Hart Stern of his legal right. This Fraud itself was a civil wrong, and a criminal wrong.

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4 **THIRD CAUSE OF ACTION**

5 **DEFAMATION OF CHARACTER**

6 Defendants made false statement, written and spoken about James Hart Stern with the intent of harming
7 his reputation. This was done not only in the Media but worst they documented their actions by going to
8 the Secretary of State and filed fraudulent documents with these false statements, at the time they filed
9 the Corporate documents putting them self on the corporation they had no legal standing.

10 **FOURTH CAUSE OF ACTION**

11 **SLANDER**

12 Defendants action was the crime of making false spoken statements to the Secretary of State, damaging
13 James Hart Stern reputation, and attempting to still his organization the NSM.

14 **FIFTH CAUSE OF ACTION**

15 **PERSONAL INJURY**

16 Defendants injured Plaintiffs body, mind and emotions. Plaintiff caused harm through negligence, gross
17 negligence, reckless conduct, and intentional misconduct, on the basis of strict liability.

18
19 injury lawsuits are filed against the person or entity that caused the harm through negligence, gross
20 negligence, reckless conduct, or intentional misconduct, and in some cases on the basis of strict liability.
21 Different jurisdictions describe the damages in different ways, but damages typically include the injured
22 person's medical bills, pain and suffering, and diminished quality of

23 **PRAYER FOR RELIEF**

24 Plaintiff as a result of Defendants malfeasance has gathered pain and suffering and diminished quality of
25 life. Plaintiff can't maintain the websites nsm88.org Plaintiff pray for the following relief:

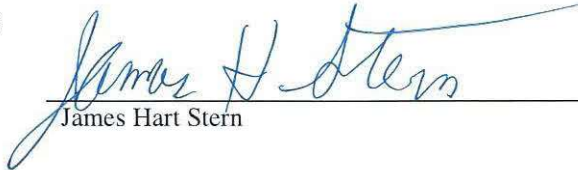
- 26 1. \$200,000,000.00 (One Hundred Million Dollars) actual Damages.
27 2. \$300,000,000.00 (Three Hundred Million Dollars) Punitive Damages

28 CAUSE OF ACTIONS:1. THEFT2. FRAUD3. DEFAMATION OF CHARACTER3. SLANDER4. PERSONAL
INJURY - 3

1 3. A restraining order restraining defendants from interfering with James Hart Stern from maintaining
2 the websites owned by the NSM, nsm88.org , nsradio.org, nsmmedia.org

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5 All the above is true under the penalty of perjury.

6 Dated this 7 day of March 6, 2019

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8 James Hart Stern

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28 CAUSE OF ACTIONS:1. THEFT2. FRAUD3. DEFAMATION OF CHARACTER3. SLANDER4. PERSONAL
INJURY - 4

AFFIDAVIT

I, Jeff Schoep, Commander and incorporator of the National Socialist Movement 10/17/2008 in the state of Michigan, personally authorized the changes of the National Socialist Movement Inc. in the filing Certificate of Corrections January 14, 2019. This includes the officers changes as such:

President to: James Hart Stern

Secretary to: James Hart Stern

Treasure to: James Hart Stern

Director to: James Hart Stern

Director to: Akeem Reinsfield

Director to: Lieutenant Shakir

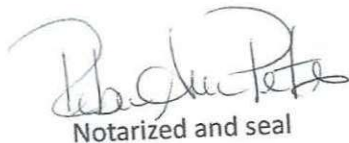
This change is to assure the operation of the organization and the website NSM88.org is under the direction of James Hart Stern.

All the above is true under the penalty of perjury.



Jeff Schoep

1-28-19



Notarized and seal

REBECCA ANN PETERS
Notary Public, Wayne County, MI
Commission Expires Dec. 07, 2023
Acting in Macomb County

1 Jeff Schoep
2 P.O. Box 13768
3 Detroit, MI 48213

4 STATEMENT OF FACTS TO RESOLVE AN ISSUE.

5 Jeff Scheop

CLAIM OF FACTS.

6 Claimant,

7 vs.

8 JAMES HART STERN,

9 Subject of Claim

10 I Jeff Schoep having a desire to be removed from a legal proceeding I feel I have no fault in, have
11 come to the following conclusion. For clarity of the reason the following actions have been taken I make the
12 following statement. Do to the opposite of views of James Hart Stern on Nationalism I have turned both the Non-
13 Profit 501(c) (3) tax exempt corporation, National socialist Movement and the domain website NSM88.org to
14 him.

15 In this way I am assuring everyone that this is not an un-sincere move to inactivate this group. James Hart Stern has
16 assured me he will not carry on the organization as it was do to his polar opposite views. If I dissolve the
17 corporation someone else could reincorporated it and carry on as normal, but by giving it to James Hart Stern This
18 will not happen. I have sincere motives, and this was not just a stunt.

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21 February 26, 2019.

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24 Jeff Scheop

25 2-27-2019

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27 PLEADING TITLE - I

28 February 27, 2019
KMURRAY
KMURRAY

K MURRAY

Notary Public, Macomb County, MI
Commission Expires July 30, 2024